15   cost.

16   Q.   And to your knowledge, were any of the

17   parties in this room other than BellSouth aware of

18   this development effort prior to about 4:15 yesterday

19   afternoon?

20   A.   To the best of my knowledge, they were

21   not. But this interface, in a slightly earlier

22   version, was shown to the Department of Justice staff

23   about two weeks ago, so there is the potential that

24   there could have been conversation between the parties

25   in this room and those folks between now and then.

1   But there's not been any public announcement of it,

2   that this particular demonstration existed.

3   Q.   Does BellSouth intend at some point to

4   provide the source code for this integration to the

5   CLECs to assist them in their own programming efforts?

6   A.   Yes, we do. Some of the source code is

7   proprietary to the company, and I have a technical

8   writer turning the proprietary code into algorithm

9   descriptions right now that will be useful to the

10   CLECs, we hope.

11   That process is supposed to -- actually,

12   I'm supposed to get a draft this weekend. Probably in

13   two or three weeks we'll have the technical

14   specifications to the technical description to the

15 point where we can make it available to the CLECs.

16 Q.   And just to be clear -- because this is

17 going to eliminate several questions -- you do not

18 intend this to become an operational interface?

19 A.   No, we do not. This is to -- the

20 operational interface would be the interface that the

21 CLEC developed using this information and the CGI

22 capabilities. This is just a demonstration, a

23 prototype.

24 Q.   And I believe while you had the prototype

25 up on the screen yesterday afternoon, you made the

☐

1 comment, RNS looks a lot like this. Do you recall

2 that comment?

3 A.   Yes, I do.

4 Q.   Have you demonstrated RNS to this

5 Authority?

6 A.   I have not personally. I do not know

7 whether the staff has seen -- or the Authority has

8 seen a demonstration of RNS outside of these

9 proceedings.

10 Q.   You certainly have not demonstrated it to

11 the Authority in the confines of this proceeding?

12 A.   No, I have not.

13 Q.   All right. And do I understand that you

14 expect the Regulatory Authority to make a

15 determination that BellSouth provides functionality in

16 substantially the same time and manner without seeing

17 the systems that BellSouth uses itself?

18 A.   Our request at the moment is that they

19 make that decision based on the filed testimony, yes.

20 Q.   You also stated while you had this

21 prototype demonstration up on the screen that you've

22 determined you need to give the CLECs a little more

23 instruction. Do you recall that?

24 A.   Yes, I do.

25 Q.   MCI has requested a data dictionary;

☐

1 correct?

2 A.   Yes, they have.

3 Q.   MCI has requested a CSR design layout

4 record; correct?

5 A.   Yes, they have.

6 Q.   We've requested a download of RSAG; is

7 that correct?

8 A.   Yes, you have.

9 Q.   And we've requested development of the

10 EDI, all those letters, PCP/IP SSL3 interface; is that

11 correct?

12 A.   Yes, that's correct.

13 Q.   Instead of giving us a demonstration of

14 how we might do something, why don't you just give us

15 what we ask for, Mr. Stacy?

16 A.   Well, it's a pretty simple answer. You

17 have also asked for and said, We can't develop CGI

18 because we don't have enough information. What I

19 developed and demonstrated was intended to be

20 responsive to that request to allow to you begin using

21 CGI.

22 Q.   And the results of that effort, you're

23 saying, will be made available to us at some point in

24 the future?

25 A.   Yes, very quickly. The information --

□

1 again, the information that is available today has

2 been available in essentially the same form, with

3 changes and corrections, but in essentially the same

4 form since July of last year.

5   And what I'm trying to do is encourage the

6 CLECs to use that information that's available to go

7 ahead and develop the interface.

8 Q.   I believe you told Mr. Hopkins that there

9 were four complex services that could be ordered

10 through EDI but that orders were not generated

11 mechanically for those services; is that correct?

12 A.   That is correct.

13 Q.   Are BellSouth's retail orders for those

14 services generated mechanically?

15 A.   BellSouth's retail orders for those

16 services are originated manually and then generated

17   mechanically, which is essentially the same thing that

18   happens to the CLECs. The CLECs submit it

19   electronically. It's then generated manually and

20   finally entered in electronic form.

21   So it's two ways of getting to the same

22   end result, except that the CLECs can transmit the

23   order electronically, where BellSouth's sales account

24   representatives actually send in a paper form to start

25   the process.

☐

1   Q.   Are you familiar with the term "split

2   order"?

3   A.   In general, but -- well, you'll have to be

4   more specific.

5   Q.   Okay. Let me define it as a situation

6   where an existing customer has, for example, ten local

7   lines and the customer decides he's going to try a

8   CLEC, such as MCI, for half of those lines, and MCI

9   enters an order to resell five of those lines to the

10   customer.

11   A.   Yes, I am familiar with that type of

12   order.

13   Q.   Is it correct that a resale order in that

14   split-order situation does not flow through?

15   A.   That's correct, it does not. It falls out

16   for manual attention. We've determined that there are

ATTACHMENT 37

LENS FAILS TO PROVIDE NON-DISCRIMINATORY
ACCESS AS AN INTERFACE FOR ORDERING AND PROVISIONING

LENS does not, and cannot, provide parity of access as an ordering interface. Indeed, by stating that it expects that only 5 percent of all orders will be sent via LENS after December 1999, BellSouth has as much as admitted that LENS is not a viable ordering interface for the vast majority of CLEC orders expected. See Stacy OSS Aff., Exh. WNS-39, p. 13 (Assumption No. 9). As in the pre-ordering process, LENS does not provide an electronic interconnection between the CLEC's systems and BellSouth's; thus, a CLEC using LENS cannot electronically transfer a service order from BellSouth's OSS into its own. Instead, the new entrant's sales representative is required to enter the same ordering data again manually into its own system (as well as into BellSouth's) if the entrant wishes to use the service order to create certain records in its own systems. BellSouth's representatives, who utilize a single interconnected system, face no such problem.

Even leaving aside the necessity of manual dual data entry, LENS has numerous shortcomings as an ordering interface that preclude it from providing parity of access in the ordering process. First, as in the pre-ordering context, LENS cannot effectively be used by large-volume CLECs as an ordering/provisioning interface. Not only does the necessity of dual data entry make the use of LENS impracticable for such CLECs; any integrated system created under the HTML alternative offered by BellSouth would be particularly unsuitable for large-volume CLECs, since the integrated system would be slower and less efficient than the integrated interfaces used by BellSouth in its retail operations. Consequently, larger new entrants are

required to use EDI for ordering and LENS for pre-ordering (since BellSouth does not make pre-ordering available through the EDI interface) -- a non-integrated, multiple process that is inferior to the process that BellSouth provides to itself.

Second, new entrants do not have the capability to order through LENS the same services that BellSouth can order electronically to support its own retail operations. For example, as reflected in the table provided below, only 6 of the 11 order types that are endorsed for use by CLECs by industry standards and available to BellSouth for its own use are available through LENS.

ACTIVITY TYPE	BellSouth OSS	Industry Standard	LENS
New Installation	Yes	Yes	Yes
Change/Modification to Existing Service	Yes	Yes	No
Inside Move -- Physical Termination within Building	Yes	Yes	No
Outside Move & End User Location Disconnect	Yes	Yes	No
Disconnect	Yes	Yes	Yes
Record Activity -- Administrative Changes	Yes	Yes	No
Conversion to New Local Service Provider with Changes	Yes	Yes	Yes
Conversion to New Local Service Provider "As Is"	Yes	Yes	Yes
Suspend Service	Yes	Yes	Yes
Restore Service	Yes	Yes	Yes
PIC Change	Yes	Yes	No

For the five types of activities which cannot be ordered through LENS, a new entrant that orders services only through LENS will be required to submit service orders by facsimile. For example, LENS cannot be used to order changes to the existing service of a customer. If the new entrant's customer wants to add a new feature such as call waiting, the CLEC will need to fax a service order to BellSouth. This is clearly discriminatory, since BellSouth's representatives have the ability to order changes to existing customer service electronically. The manual processing of change orders also significantly burdens both CLECs and their customers, since requests by customers for changes in service are quite commonplace in the local exchange market.

Moreover, as shown in the following chart, LENS is greatly limited in its ordering capability because it supports only three of the ten industry standard requisition types identified by industry groups to identify the kinds of products and services that a new entrant can order.

Requisition Types	Industry Standard	LENS
Loop	Yes	No
Loop with Interim Number Portability	Yes	No
Interim Number Portability	Yes	No
Retail/Bundled	Yes	No
Resale	Yes	Yes
Port	Yes	No
Directory Assistance	Yes	No
Directory Listing -- White	Yes	Yes
Directory Listing -- Yellow	Yes	Yes
Port/Loop Combination	Yes	No

Thus, service orders from CLECs for any requisition type other than simple resale will not be processed electronically by LENS. Any such orders must be submitted either by fax or, in some cases, by using the remarks field in LENS, which will cause the order to fall out for manual processing.

In short, if a customer who initially orders service from a new entrant later wishes to add a new feature, add a new line to its existing service, move from one location to another within the same building, move down the street, change its directory listing, change its billing address, indicate the type of business it conducts in the white page listing, or change its choice of primary interexchange carrier, the new entrant will be unable to use LENS to place any of these order requests with BellSouth. Instead, the entrant will be required to send the order by facsimile (or by EDI, if the entrant has equipped itself with that interface) -- a process that increases the risk of errors, time and expense for the entrant.

LENS also does not provide new entrants the capability to order all of the particular services that BellSouth makes available for resale. In fact, a new entrant can order only from eight of the 114 families of services that are listed in the LENS Inquiry Mode (pre-ordering mode) as available for resale (in addition to POTS). The remaining 106 families of services must be ordered by facsimile -- an error-prone, costly and time-intensive process. In contrast, BellSouth has the capability to submit electronic orders for all of those 114 families of services. The following table lists the 114 families of service available, with the eight services that can be ordered through LENS (i.e., the services listed as available in the Firm Order Mode of LENS) identified in boldface.

MEMORY CALL	SYNCHRONET MULTIPOINT	CALL DETAIL
FAX	800 SVC-CXR SEL ON REV CH	MWI VISUAL
COURTESY COMPLETE	NUMBER PORTABILITY RCF	SHARED SPEED CALLING
PRESTIGE I	BELLSOUTH.NET	MULTISERVE EBS
MULTILINE HUNT GROUP	UNIF ACCESS NUMBER	CUSTOMIZED CODE RESTRICTION
SURROGATE CLIENT NUMBER	MLHG OVERFLOW	TOUCHSTAR PULSE SGN
TOUCHSTAR	TOUCHTONE	MULTISERVE ACD
SAVER SERVICE	CALL PATTERNS	CUSTOMIZED DIALING PK
MEGA-LINK ISDN	MULTISERVE SERVICE	SPECTUS-COM'L QUAL VIDEO
ALTERNATE ROUTING	AUTO NUMBER IDENTIFICATION	EOEAS
BELLSOUTH LONG DISTANCE	FLEXSERVE SERVICE	ACCUPULSE
ESSX ISDN-NATIONAL	AMS-SVC ORDER REQUESTS	PRESTIGE COMM SERVICE
DID WITH USER TRANSFER	CUTOFF ON DISCONNECT	MEMORY CALL ENHANCED
MAKE BUSY/NIGHT TRANSFER	SMPL MSG DESK INTERFACE	MESSAGE RATE SERVICE
MSG WAITING IND AUDIBLE	QUICKSERVICE	ISDN-IND LINE SVC-CUSTOM
PRESTIGE SINGLE LINE	INTRALATA EQUAL ACCESS	ESSX
CONDITIONING	VOICE ACTIVATED DIALING	ZIPCONNECT
C.O. BLOCK W/OPR SCREEN	INTERSWITCH SMDI	PPSN-REV CHG ACC
ADWATCH	ROUTE DIVERSITY	PULSELINK
ESSX ISDN-CUSTOM	DID	MWI NO RATE HTG TEMP FIX
MSG WAITING IND AUD/VIS	AREA PLUS SERVICE	LOCAL MEASURED SVC
MWI ACTIVATION (VISUAL)	ISDN-IND SVC-NATL	SELECT CLASS CALL SCREEN
TRNK SIDE ACCESS	MWI ACTIVATION (AUDIBLE)	CALL DETAIL INFORMATION
PATHLINK	MLHG CO ANNOUNCE	VISUAL DIRECTOR
HIGH CAP DIGITAL SVC	VOICE GRADE LINE/CKT SW BSA	PRESTIGE DELUXE
MLHG ACCESS TO EACH PORT	BRIDGING	IPP
WARM LINE	REV BLLG ON CKT/PKT ACC	QUEUING
FASTER SIGNALING ON DID	CUST SERVICE AREA (ACCS)	AUTO NMBR IDENT VIA FGD
AUTO NMBR IDENT VIA FGB	HOT LINE	DTMF SIGNALING ON DID
BACK-UP LINE	UNIF UCD LINE HUNTING	PPSN-RPOA PRESELECT

AIN TOOLKIT	TRUNK SIDE ACC (TANDEM)	ISDN-IND LINE SVC-NATL2
REMOTE CALL FORWARDING	PRESTIGE II	AUTO PROTECTION SWITCHING
SWITCH ACCESS	SYNCHRONET SERVICE	DID TRUNK QUEUING
CCSAC-	UNIF 7D ACC NUM RCF	RINGMASTER
MEGA-LINK ISDN NATL2	WATSSAVER SERVICE	PATHLINK (NI-2)
CRISIS LINK	CUSTOM CALLING	CLLD DN VIA 900 NXX
800 SVC TO DID LINE		

In addition, as reflected in the table below, LENS does not provide new entrants the capability to order 17 of the 21 directory listing options that a BellSouth service representative can order electronically for its customers:

Directory Listing Options	BellSouth	LENS
Listed Name	Yes	Yes
Non-published	Yes	Yes
Non-listed	Yes	Yes
Additional Listing	Yes	Yes
RingMaster	Yes	No
Alternate Call	Yes	No
Answering Service	Yes	No
Cross Reference	Yes	No
Designer Bold	Yes	No
Designer Bold Plus	Yes	No
Designer Script	Yes	No
Designer Script Plus	Yes	No
Designer Extra Line Standard	Yes	No
Designer Extra Line Bold	Yes	No

Directory Listing Options	BellSouth	LENS
Designer Extra Line Script	Yes	No
Foreign Listing	Yes	No
Foreign Cross Reference	Yes	No
Stylist	Yes	No
Indentions	Yes	No
Captions	Yes	No
Designation	Yes	No

A new entrant using LENS would therefore be required to submit orders for most of these

directory listing options by facsimile, assuming that the new entrant knew that these options were

available. These cumbersome multiple processes are plainly inferior to those of BellSouth,

which can submit orders for these options electronically.

Orders for "complex" services also cannot be submitted via LENS; they must be

submitted manually. As I previously explained in my discussion of EDI, BellSouth electronically

inputs all orders for all complex services into its own systems. Once that order is entered,

BellSouth's systems generate a service order and enter the information from the order into its

various legacy systems. CLECs, by contrast, are unable to enter such orders into their own

systems, given the nature of BellSouth's procedure for handling orders for complex services.

Third, as described in Attachment 37a, LENS does not provide a new entrant with

the same on-line, front-end edits available in BellSouth's-RNS or Service Order Navigation

System ("SONGS"), which is used by BellSouth in Louisiana and certain other states in the

BellSouth region. On-line edits in these BellSouth systems check for errors and prevent the

release of orders to SOCS until the BellSouth service representative corrects such errors. LENS,

by contrast, performs a more limited on-line edit of a CLEC's order; the edits for content and for conformity with BellSouth's business rules are not nearly as extensive as those performed on BellSouth's retail interfaces.[1] Therefore, LENS will release orders with errors that BellSouth's own ordering systems would not release. Many errors in LENS orders will be identified only after LENS releases the order and the new entrant's service representative is off-line with respect to that particular order. Without on-line edits, new entrants are more likely to submit orders with errors that cause rejection by BellSouth's systems; in that case, either BellSouth will process the order manually or the order will have to be resubmitted after the CLEC receives a rejection notice. The cycle time for that process will cause delays in providing service to customers, as well as increase transaction costs.

Even where LENS does provide on-line edits, it does so inefficiently. For example, unlike BellSouth's systems, LENS does not highlight mandatory fields to distinguish them from optional fields -- a procedure that increases the risk that necessary data will be omitted, and the order later rejected. In addition, LENS only displays one error at a time. Thus, if a particular order has three errors, a new entrant would have to repeat essentially the same ordering process three times in order to identify and correct all of the errors.

Fourth, CLECs using LENS do not have the same ability to change a pending order as a BellSouth representative. Once a CLEC has submitted an order via LENS, the changes that the CLEC can subsequently make in the pending order are more limited in range than those available to a BellSouth representative. For example, a CLEC cannot change the basic class of

---

[1] Although BellSouth's Release 2.0, which was issued on March 16, 1998, was supposed to install front-end its on both LENS and EDI-PC, BellSouth has not described the specific edits that it has implemented.

service (from business to residential, or vice versa), an address (if the address is in a different wire center), requisition type (resale to directory listings), and activity type (new installation to conversion). By contrast, BellSouth's representatives can cancel or change customer orders on their systems at any time.

In short, LENS requires CLECs to use manual processes that BellSouth is not similarly required to use in its retail operations. These processes have less functionality and are slower, more prone to errors, and more costly than BellSouth's own systems; all of these deficiencies adversely affect a new entrant's ability to provide customers with the same level and quality of service that BellSouth can provide its customers. For these reasons, LENS does not provide nondiscriminatory access as an ordering/provisioning interface.

ATTACHMENT 37a

BellSouth/Competitive Local Provider Service Order Edits are Discriminatory

BellSouth has not Provided Business Rules, Edit Information or Codes Which are Necessary for CLECs to be able to Pre-Edit Their Own Orders

System Used and User	SONGS BellSouth	RNS BellSouth	EDI - Mainframe CLEC	EDI - Personal Computer CLEC	LENS CLEC	EXACT CLEC
Edits Applied by BellSouth						
On-Line						
FUEL		X				
SOLAR		X				
SOER	X					
Release 2.0				X	X	
After Order Submission						
SOER		X	X	X	X	X
LEO			X	X	X	
LESOG			X	X	X	
CLEC Pre-Edit			X(1)			

(1) A CLEC can build a pre-editor to match BellSouth only if BellSouth provides the business rules, edit information and codes being used in the systems handling the CLEC's orders. BellSouth has not made this information available.

FUEL = FID and USOC Edit Library
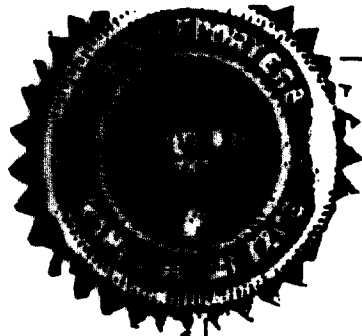SOLAR = Service Order Layout and Analysis Routine
SOER = Service Order Edit Routine
LEO = Local Exchange Ordering
LESOG = Local Exchange Service Order Generator
Release 2.0 (effective March 16, 1998) = Provides some unspecified on-line edits in the EDI-PC and LENS software.

ATTACHMENT 38

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

3 In Re: Consideration of   )
   BellSouth Telecommunications   )DOCKET NO. 960786-TL
4 Inc.'s entry into interLATA services)
   pursuant to Section 271 of the Federal)
5 Telecommunications Act of 1996.   )
)

6

7

   DEPOSITION OF: WILLIAM N. STACY
8
   TAKEN AT THE
9 INSTANCE OF: THE STAFF OF THE FLORIDA
                             PUBLIC SERVICE COMMISSION
10
   PLACE: GERALD L. GUNTER BUILDING
11   ROOM 262
                             2540 SHUMARD OAK BOULEVARD
12   TALLAHASSEE, FLORIDA

13 TIME: COMMENCED AT 11:00 A.M.
                             CONCLUDED AT 6:45 P.M.
14
   DATE   AUGUST 14, 1997
15
   REPORTED BY: NANCY S. METZKE, RPR, CCR
16   C & N REPORTERS
                             POST OFFICE BOX 3093
17   TALLAHASSEE, FLORIDA   32315

18

19

20
                      C & N REPORTERS
21   REGISTERED PROFESSIONAL REPORTERS
                   POST OFFICE BOX 3093
22   TALLAHASSEE, FLORIDA   32315-3093
                     (904) 385-5501
23

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1 operating support system.

2   Q   Exactly what do you mean by their effort?

3   A   Let me use a specific example I've used earlier,

4 the EDI ordering form is the national standard for

5 ordering, and that has been established. There has been no

6 national standard for pre-ordering established, and

7 BellSouth developed LENS as its desire to make the

8 pre-ordering data available to the carriers in

9 substantially the same time and manner as it's available to

10 our own service reps.

11   How the carriers use that pre-ordering data and

12 combine that with the ordering process through EDI is then

13 a business decision they have to make, whether they wait on

14 the evolving national standard that we believe is going to

15 happen for pre-ordering, whether they accept AT&T's version

16 called EC-Lite and integrate that with their systems or

17 whether they do something else. We believe our commitment

18 was to make the data available, to provide access to the

19 pre-ordering operating support systems in substantially the

20 same time and manner and not to do the integration for

21 them.

22   We did, for the small carriers, produce the

23 integrated solution called LENS that includes both ordering

24 and pre-ordering believing that some of the small carriers

25 would not want to adapt to their systems or commit to that

1 work effort on their own. So we have made a series of

2 tools available that range from very simple to very complex

3 that the carriers have access to the OSSs through, and

4 they've got to pick how that fits into their business model

5 and implement that as their own choice.

6   Q   I would like to refer you now to page 28 in your

7 direct testimony, looking in lines 2 through 7. You state

8 there that BellSouth has collected data that would compare

9 its performance to ALECs with BellSouth's performance to

10 its own retail customers. Could you explain, why didn't

11 BellSouth include a comparison of CLECs in Florida to

12 BellSouth in Florida in exhibit WNS-F?

13   A   No, I can't explain why we didn't do that. I

14 don't remember when we were preparing that exhibit why

15 Florida was not brought into that comparison.

16   Q   Does BellSouth have this information?

17   A   The data is available. It will have to be

18 reassembled in this format, but it is available.

19   Q   We would like that as another late-filed

20 exhibit. I noticed that --

21   MS. WHITE: Wait a minute. Let me just make sure

22 I have the right stuff. So you want to add to WNS-F

23 information for BellSouth in Florida?

24   MS. CULPEPPER: Correct.

25 BY MS. CULPEPPER:

ATTACHMENT 39

Pamela A. Nelson

Room 12N54
1200 Peachtree St. NE
Atlanta, GA 30309
404 810-3100

AT&T

April 9, 1998

Ms. Jan M. Burriss
BellSouth Interconnection Services
1960 West Exchange Place, Suite 200
Tucker, Georgia 30084

Dear Jan:

This is to advise you that effective immediately, AT&T is suspending implementation and deployment of the Maintenance Electronic Bonding Interface ("EBI").

Because the EBI interface requires significant transaction volumes for it to be cost-effective, and because such volumes are unattainable given our inability to get the form of interconnection we need, we are discontinuing its implementation. AT&T has previously stated that we cannot continue to pursue entry via resale because it is not a financially viable option. AT&T also has been foreclosed from offering local exchange service via the UNE Platform because BellSouth has refused to make the platform available. In addition, information we have been provided by BellSouth indicates that local service using UNEs will be designed as private line circuits. That being the case, it is unclear whether the EBI interface is usable in a UNE environment. Until its utility in that environment is clear, it is not prudent to continue expenditures for its development.

In light of the suspension of this EBI capability, BellSouth and AT&T need to maintain the existing manual arrangements to provide repair and maintenance services for any current AT&T local service customers. We appreciate your cooperation in maintaining those arrangements.

AT&T remains committed to entering local exchange markets where appropriate conditions exist and will obviously need to implement maintenance and repair interfaces to support such entry. When the appropriate conditions exist, AT&T will resume its development and implementation of the maintenance and repair interface.

Sincerely,

Pam Nelson /kl

cc: Ray Crafton
       Michelle Augier

ATTACHMENT 40